



Ashland Performance Materials

Division of Ashland Inc.
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January 13, 2011

Mr. Jan P. Szaro
U. S. Environmental Protection Agency – Region III
Office of Land Enforcement (3LC70)
1650 Arch Street
Philadelphia, Pennsylvania 19103

RE: Ashland Inc., 329 West Main Street, Elkton, MD
EPA ID No. MDD003067832

Docket No: R3-11-NOV-RCRA-12
Notice of Violation Response

Dear Mr. Szaro:

The letter is in response to your January 10, 2011 correspondence to Mr. Bill Hill concerning alleged deficiencies noted during a Compliance Evaluation Inspection that US EPA conducted at the above mentioned facility on March 23, 2010. The Notice of Violation indicates that the deficiencies related to the plant's handling of aerosol cans and potential mercury-containing lamps, i.e., "universal wastes."

Please be advised that upon notice of the alleged deficiencies, the facility implemented the following practices:

Aerosol Cans

Spent aerosol cans are collected in a metal 55 gallon drum that is stored outside of the Maintenance Shop. The drum must be labeled with a commercially available "Hazardous Waste" label with all required information filled in except the accumulation date. Also, the drum must be labeled with the hazard warning "Flammable."

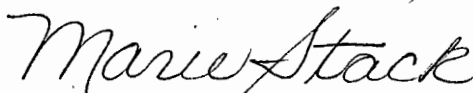
The drum must be kept closed except when adding aerosol cans. Once the drum is full, the accumulation start date is filled in on this label. Within three days of the accumulation start date, the drum is shipped out of the facility. Ashland Distribution Environmental Services handles the disposal of this waste stream.

Universal Waste Lamps

Used fluorescent lamps are collected in structurally sound boxes that are provided to the facility by Ashland Distribution Environmental Services. The boxes are stored in the Maintenance Work Area. The boxes must be kept closed and must lack evidence of damage. The boxes must be labeled "Universal Waste - Lamps" and storage is limited to one year. The box is dated when it is first used to accumulate the lamps. Ashland Distribution Environmental Services handles the recycling of the lamps.

Ashland believes that these procedures meet the regulatory requirements for storage and disposal of these materials. Should you have any question concerning this information or if additional information is needed, please do not hesitate to contact me at (864) 845-2990.

Sincerely,



Marie V. (Renie) Stack

Manager - Environmental, Health and Safety

cc: Herschel Craven - Ashland Inc., Plant Manager
Nicole Hamilton - Ashland Inc., Corporate EH&S
Gordon Mueller - Ashland Inc., Quality Manager
Kristina Woods - Ashland Inc., Corporate Law